

FISH & RICHARDSON P.C.

Katherine K. Lutton (CSB No. 194971)
lutton@fr.com
500 Arguello Street, Suite 500
Redwood City, CA 94063
Tel: (650) 839-5070 Fax: (650) 839-5071

Ruffin B. Cordell (*pro hac vice*)
cordell@fr.com
1425 K Street, NW, Suite 1100
Washington, DC 20005
Tel: (207) 783-5070 Fax: (207) 783-2331

Christopher O. Green (*pro hac vice*)
cgreen@fr.com
Aamir A. Kazi (*pro hac vice*)
kazi@fr.com
Jacqueline Tio (*pro hac vice*)
tio@fr.com
1180 Peachtree Street, 21st Floor
Atlanta, GA 30309
Tel: (404) 892-5005 Fax: (404) 892-5002

Benjamin C. Elacqua (*pro hac vice*)
elacqua@fr.com
Brian G. Strand (*pro hac vice pending*)
strand@fr.com
1221 McKinney Street, Suite 2800
Houston, TX 77010
Tel: (713) 654-5300 Fax: (713) 652-0109

WILMER CUTLER PICKERING HALE AND DORR LLP

Joseph J. Mueller (*pro hac vice*)
joseph.mueller@wilmerhale.com
60 State Street
Boston, MA 02109
Tel: (617) 526-6000 Fax: (617) 526-5000

Matthew Hawkinson (CSB No.248216)
matthew.hawkinson@wilmerhale.com
350 South Grand Avenue, Suite 2100
Los Angeles, California 90071
Tel: (213) 443-5300 Fax: (213) 443-5400

Mark D. Selwyn (CSB No. 244180)
mark.selwyn@wilmerhale.com
950 Page Mill Road
Palo Alto, CA 94304
Tel: (650) 858-6000 Fax: (650) 858-6100

ATTORNEYS FOR DEFENDANT APPLE INC.

NELSON BUMGARDNER, P.C.

Barry J. Bumgardner (*pro hac vice*)
barry@nbclaw.net
Jonathan H. Rastegar (*pro hac vice*)
jrstegar@nbclaw.net
3131 West 7th Street, Suite 300
Fort Worth, Texas 76107
Tel: (817) 377-9111 Fax: (817) 377-3485

BURNS & LEVINSON LLP

Howard J. Susser (*pro hac vice*)
hsusser@burnslev.com
Zachary R. Gates (*pro hac vice*)
zgates@burnslev.com
Alexandra Capachietti (*pro hac vice*)
acapachietti@burnslev.com
125 Summer Street
Boston, Massachusetts 02110
Tel: (617) 345-3000 Fax: (617) 345-3299

SUSMAN GODFREY L.L. P.

Kalpana Srinivasan (CSB No. 237460)
ksrinivasan@susmangodfrey.com
Frances S. Lewis (CSB No. 291055)
flewis@susmangodfrey.com
Trevor P. Stutz (CSB No. 296882)
tstutz@susmangodfrey.com
1901 Avenue of the Stars, Suite 950
Los Angeles, California 90067-6029
Tel: (310) 789-3100 Fax: (310) 789-3150

Max L. Tribble. (*pro hac vice*)
mtribble@susmangodfrey.com
1000 Louisiana, Suite 5100
Houston, Texas 77002-5096
Tel: (713) 651-9366 Fax: (713) 654-6666

ATTORNEYS FOR PLAINTIFF GPNE CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)

GPNE Corp.,

Plaintiff,

v.

APPLE INC.

Defendant.

Case No. 5:12-cv-02885-LHK

**JOINT SUBMISSION REGARDING
REQUESTS TO SEAL FOR MR. DANSKY**

Judge: Hon. Lucy H. Koh

The parties have met and conferred, and have resolved their objections regarding the exhibits and demonstratives to be used in connection with Mr. Dansky. However, the parties' direct and cross exhibits implicate a number of materials designated "Confidential – Attorneys' Eyes Only" under the Protective Order that contain commercially sensitive and valuable information to GPNE, Apple, and third parties. These include license agreements, financial information, bill of material documents, and invoices that have been sealed or redacted from reports and briefs pursuant to prior Court orders deeming the parties' request to seal these materials narrowly tailored to confidential business information. *See* Dkt. Nos. 240, 328, and 362. These exhibits include: DTX 60-65, DTX 83, DTX 88-90, DTX 100, DTX 107, DTX 115-16, DTX 205, DTX 331-50, JTX 8, JTX 21-23, JTX 32, JTX 36, JTX 42, JTX 57, JTX 59-60, PTX 148-51, PTX 179-81, PTX 227-28, PTX 233-34, PTX 250-51, and PTX 279. The parties have conferred and agree to the sealing of the materials. The parties have further agreed to confer over the next two days to propose a procedure to the Court for the sealing of these documents in the courtroom.

1 Dated: October 8, 2014

Dated: October 8, 2014

2 **FISH & RICHARDSON P.C.**

SUSMAN GODFREY L.L.P.

3
4 By: /s/ Christopher O. Green
Christopher O. Green

By: /s/ Kalpana Srinivasan
Kalpana Srinivasan

5
6 **ATTORNEYS FOR DEFENDANT**
APPLE INC.

ATTORNEYS FOR PLAINTIFF
GPNE CORP.